

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: Christopher M DeRose
Debtors

Nationstar Mortgage LLC,
Movant,

v.

Christopher M DeRose,
Respondent/Debtors,
and
Kenneth E. West, Office of the Chapter 13
Standing Trustee, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
23-11209-mdc

**OBJECTION OF NATIONSTAR MORTGAGE LLC TO CONFIRMATION OF
DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

Nationstar Mortgage LLC, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about April 26, 2023, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 3342 Kayford Cir, Philadelphia, PA 19114.
3. Movant is in the process of filing its Proof of Claim citing arrears in the amount of \$16,447.44.
4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$11,000.00 to be paid to the Trustee through the Plan.
5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
6. The Plan fails to comply with 11 U.S.C. § 1322.
7. The Plan fails to comply with 11 U.S.C. § 1325.
8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, Nationstar Mortgage LLC respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: 8/18/2023

LLG File #:23-069726

BY: /s/ Heather S. Riloff
Heather S. Riloff 309906
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King of Prussia, PA 19406
(610) 278-6800/ fax (847) 954-4809
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CERTIFICATE OF SERVICE

I, Heather S. Riloff, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Nationstar Mortgage LLC's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on August 21, 2023:

Brad J. Sadek, Esquire
Sadek and Cooper
1500 JFK Boulevard Ste 220
Philadelphia, PA 19102
Sent via electronic notification brad@sadeklaw.com

Kenneth E. West, Office of the Chapter 13 Standing Trustee, Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107
Sent via electronic notification ecfemails@ph13trustee.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Heather S. Riloff
CHRISTOPHER A. DENARDO 78447
HEATHER S. RILOFF 309906
LOGS Legal Group LLP
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King of Prussia, PA 19406
(610) 278-6800